

Message

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**From:** Santos, Carmen [Santos.Carmen@epa.gov]  
**Sent:** 5/19/2016 5:33:18 PM  
**To:** 'Leo Brausch' [Lbrausch@brauschenv.com]  
**CC:** 'Rykaczewski, Dave A.' [dave.rykaczewski@wspgroup.com]; 'Romano, Amy M.' [amy.romano@wspgroup.com]; 'Cepko, Russ P' [Russ.Cepko@cbs.com]; 'Diana Olson' [diana.olson@hagerpacific.com]; 'Mark Cousineau' [markc@hmcinc.biz]; 'Rob Neal' [rob.neal@hagerpacific.com]  
**Subject:** RE: Former Westinghouse Apparatus Repair Plant, Rancho Dominguez, California  
**Attachments:** 05\_18\_2016\_CBS Westinghouse Site\_Comments\_PostCleaningBuildingSamplingResults.docx

Hello Leo:

I am following up on my previous messages.

Attached are comments on the results for concrete, surface wipes, and indoor air. I have to follow up on the EPC calculations with a different toxicologist here in our office. The toxicologist that reviewed the EPC calculations that CBS submitted retired.

I think we are very close in terms of the development of a cleanup plan.

If CBS and the owner of the property/consultants would like to go over the attached comments, please suggest dates with several times when that would be convenient for you. I am in the office next week except on May 27. My calendar on May 26 is very full. I have meetings and calls here and there on other days within that week.

Best,  
Carmen

*Carmen D. Santos*

PCB Coordinator  
USEPA Region 9 (LND-4-1)  
Land Division  
75 Hawthorne Street  
San Francisco, CA 94105  
Voice: 415.972.3360  
[santos.carmen@epa.gov](mailto:santos.carmen@epa.gov)

*"Think left and think right and think low and think high. Oh, the things you can think up if only you try!" Dr. Seuss*

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**From:** Santos, Carmen  
**Sent:** Monday, April 25, 2016 6:13 PM  
**To:** 'Leo Brausch' <Lbrausch@brauschenv.com>  
**Cc:** Rykaczewski, Dave A. <dave.rykaczewski@wspgroup.com>; Romano, Amy M. <amy.romano@wspgroup.com>; Cepko, Russ P <Russ.Cepko@cbs.com>; Diana Olson <diana.olson@hagerpacific.com>; Mark Cousineau <markc@hmcinc.biz>; Rob Neal <rob.neal@hagerpacific.com>  
**Subject:** RE: Former Westinghouse Apparatus Repair Plant, Rancho Dominguez, California

Hello Leo:

CBS is a key player. If CBS does see a benefit in meeting with EPA in person at this time that is okay.

I have reviewed all the information sent by CBS when it was submitted. Unfortunately, I had an accident in October that set me back on all my projects. I am trying to get this project back on track and appreciate the email that you sent.

By the middle of May I will be able to reply more fully to questions in your email. I will call you next week to go over some questions that I had after I first review the data package that CBS sent to me. A few additional figures may be necessary. We need to go over our thoughts on the area of concrete floor that is proposed for remediation as we have some differences in opinion and yet we are not that far apart on the concrete cleanup.

I leave you with this preliminary thoughts and would like to set a time to talk with you sometime next week if you have the time.

Best,  
Carmen

*Carmen D. Santos*  
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**From:** Leo Brausch [<mailto:Lbrausch@brauschenv.com>]  
**Sent:** Friday, April 22, 2016 12:16 PM  
**To:** Santos, Carmen <[Santos.Carmen@epa.gov](mailto:Santos.Carmen@epa.gov)>  
**Cc:** Rykaczewski, Dave A. <[dave.rykaczewski@wspgroup.com](mailto:dave.rykaczewski@wspgroup.com)>; Romano, Amy M. <[amy.romano@wspgroup.com](mailto:amy.romano@wspgroup.com)>; Cepko, Russ P <[Russ.Cepko@cbs.com](mailto:Russ.Cepko@cbs.com)>; Diana Olson <[diana.olson@hagerpacific.com](mailto:diana.olson@hagerpacific.com)>; Mark Cousineau <[markc@hmcinc.biz](mailto:markc@hmcinc.biz)>; Rob Neal <[rob.neal@hagerpacific.com](mailto:rob.neal@hagerpacific.com)>  
**Subject:** RE: Former Westinghouse Apparatus Repair Plant, Rancho Dominguez, California

Carmen,

Before scheduling any meetings regarding the former Westinghouse plant site in Rancho Dominguez, can we please assess where we are in the process of developing the interior cleanup plan? As described below, CBS does not believe a meeting at EPA's office in San Francisco is warranted at this time and proposes that the parties proceed using the approach and schedule that we previously established with the agency.

As you recall, CBS hosted meetings by conference calls with EPA on September 23 and October 1, 2015 (more than four hours total) in which we walked through all of the air sampling data as well as the porous and non-porous surface data developed in the post-cleaning characterization sampling event. We also discussed initial thoughts on cleanup standards, remedial approaches, and alternatives. CBS provided the data both electronically and in hard copy on tables and figures according to EPA's request.

Following the October 1, 2015 call, as requested by EPA, CBS provided (via email dated October 22, 2016) a detailed schedule for proceeding with the cleanup plan development. CBS then submitted, on October 30, 2015 in accordance with the agreed-to schedule, ProUCL calculations of exposure point concentrations (EPCs) in various media. Although all parties agreed that the EPCs needed to be nailed down before proceeding further, we have not yet received EPA's approval of (or comments on) those EPC calculations.

Once the EPCs are set, CBS proposes to resume the work on cleanup plan development in accordance with the established schedule:

- CBS submittal of draft annotated outline of proposed cleanup plan - 4 weeks;
- EPA review and comment on the draft annotated outline - 2 weeks; and
- CBS submittal of draft application and proposed cleanup plan - 6 weeks.

Other than discussing any issues regarding the ProUCL calculations (no significant issues are expected) and confirming the schedule, both of which could be achieved in a brief conference call, CBS sees no need to meet with EPA at this time. Moreover, as we have previously indicated, if an in-person meeting is to be held, we believe it would be much more fruitful to conduct an on-site meeting and tour that coincides with EPA's review period for the draft annotated outline.

We look forward to receipt of EPA review of the ProUCL calculations and EPCs and are prepared to resume preparation of the draft annotated outline of the proposed cleanup plan as soon as those EPCs are set. In the meantime, if you have any questions, please do not hesitate to contact me. Thank you.

Leo M. Brausch  
Office: (704) 246-7266  
Cell: (412) 720-8549  
Fax: (980) 339-3017

---

**From:** Santos, Carmen [<mailto:Santos.Carmen@epa.gov>]  
**Sent:** Friday, April 22, 2016 1:54 PM  
**To:** Diana Olson <[diana.olson@hagerpacific.com](mailto:diana.olson@hagerpacific.com)>; Mark Cousineau <[markc@hmcinc.biz](mailto:markc@hmcinc.biz)>  
**Cc:** Leo Brausch <[Lbrausch@brauschenv.com](mailto:Lbrausch@brauschenv.com)>; Rykaczewski, Dave A. <[dave.rykaczewski@wspgroup.com](mailto:dave.rykaczewski@wspgroup.com)>; Romano, Amy M. <[amy.romano@wspgroup.com](mailto:amy.romano@wspgroup.com)>; Cepko, Russ P <[Russ.Cepko@cbs.com](mailto:Russ.Cepko@cbs.com)>  
**Subject:** RE: Former Westinghouse Apparatus Repair Plant, Rancho Dominguez, California

Greetings Diana and Mark:

I appreciate your quick reply. Please let me know which dates work for you and the building owners on the second week of May 2016. I will be out of the office on Monday May 9.

Best,  
Carmen

Carmen D. Santos  
PCB Coordinator  
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San Francisco, CA 94105  
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**From:** Diana Olson [<mailto:diana.olson@hagerpacific.com>]  
**Sent:** Thursday, April 21, 2016 5:14 PM  
**To:** Santos, Carmen <[Santos.Carmen@epa.gov](mailto:Santos.Carmen@epa.gov)>; Mark Cousineau <[markc@hmcinc.biz](mailto:markc@hmcinc.biz)>  
**Cc:** Leo Brausch <[Lbrausch@brauschenv.com](mailto:Lbrausch@brauschenv.com)>; Rykaczewski, Dave A. <[dave.rykaczewski@wspgroup.com](mailto:dave.rykaczewski@wspgroup.com)>; Romano, Amy M. <[amy.romano@wspgroup.com](mailto:amy.romano@wspgroup.com)>; Cepko, Russ P <[Russ.Cepko@cbs.com](mailto:Russ.Cepko@cbs.com)>  
**Subject:** RE: Former Westinghouse Apparatus Repair Plant, Rancho Dominguez, California

Hi Carmen,

Building ownership would look forward to participating in an in-person meeting in San Francisco. Please let us know prospective dates as soon as they are available.

Thank you,

Diana

**Diana L. Olson**  
**Asset Manager**



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**From:** Santos, Carmen [<mailto:Santos.Carmen@epa.gov>]  
**Sent:** Thursday, April 21, 2016 4:39 PM  
**To:** Mark Cousineau  
**Cc:** Leo Brausch; Rykaczewski, Dave A.; Romano, Amy M.; Cepko, Russ P; Diana Olson  
**Subject:** RE: Former Westinghouse Apparatus Repair Plant, Rancho Dominguez, California

Hello Mark:

Thank you for your call. I am glad you talked with me today.

My plan is to refresh my reviews of the information that CBS submitted last year and to schedule a meeting to go over our thoughts on the data we received from CBS. Also in that meeting we could revisit the next steps that CBS had proposed to confirm they are consistent with EPA's previous correspondence and still a reasonable way to move forward with the PCB cleanup work in the interior of the building. My preference at this moment is to have a person to person meeting here in San Francisco at the EPA office building if CBS and the owner of the property are interested in having the meeting here.

Thank you for your call and courtesies.

Sincerely,  
Carmen

Carmen D. Santos  
PCB Coordinator  
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Land Division  
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**From:** Mark Cousineau [<mailto:markc@hmcinc.biz>]

**Sent:** Thursday, April 21, 2016 4:13 PM

**To:** Santos, Carmen <[Santos.Carmen@epa.gov](mailto:Santos.Carmen@epa.gov)>

**Cc:** Leo Brausch <[Lbrausch@brauschenv.com](mailto:Lbrausch@brauschenv.com)>; Rykaczewski, Dave A.

<[dave.rykaczewski@wspgroup.com](mailto:dave.rykaczewski@wspgroup.com)>; Romano, Amy M.

<[amy.romano@wspgroup.com](mailto:amy.romano@wspgroup.com)>; Cepko, Russ P <[Russ.Cepko@cbs.com](mailto:Russ.Cepko@cbs.com)>; Diana Olson

<[diana.olson@hagerpacific.com](mailto:diana.olson@hagerpacific.com)>

**Subject:** Re: Former Westinghouse Apparatus Repair Plant, Rancho Dominguez, California

Carmen,

It was a pleasure talking to you today. I wanted to send you this follow up email so you have my contact info.

Regards

Mark Cousineau, REA II

Principal

Hazard Management Consulting Inc.

211 West Avenida Cordoba Suite 200

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(949) 361-3902 p

(949) 361-3697 f

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[markc@hmcinc.biz](mailto:markc@hmcinc.biz)

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On Oct 27, 2015, at 6:11 PM, Santos, Carmen  
<[Santos.Carmen@epa.gov](mailto:Santos.Carmen@epa.gov)> wrote:

Hello Leo:

Thank you for sending the schedule for the PCB Application / Cleanup Plan. The proposed schedule is fine with the changes in red font. Also, EPA anticipates that it is possible the schedule may need to be revised. I will be out for the holiday season. Also, if the Government is not funded beyond December 15, a Government shutdown may happen and EPA offices may be closed during the shutdown, if a shutdown occurs.

**CBS Proposed Schedule for the PCB Application / Cleanup Plan**

- CBS submittal of ProUCL calculations of exposure point concentrations in various media – October 30, 2015;
- EPA review and comment on EPC concentrations (1 week) – November 11 6, 2015;
- CBS submittal of draft annotated outline of proposed cleanup plan (4 weeks) – December 4, 2016;
- EPA review and comment on the draft annotated outline (2 weeks) – December 18, 2015
- CBS submittal of draft application and proposed cleanup plan (6 weeks) – January 29, 2015.

Thank you for your courtesies and I look forward to CBS' deliverables.

Sincerely,  
Carmen

Carmen D. Santos  
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**From:** Leo Brausch [<mailto:Lbrausch@brauschenv.com>]  
**Sent:** Thursday, October 22, 2015 7:59 AM  
**To:** Santos, Carmen <[Santos.Carmen@epa.gov](mailto:Santos.Carmen@epa.gov)>

**Cc:** Rykaczewski, Dave A. <dave.rykaczewski@wspgroup.com>; Romano, Amy M. <amy.romano@wspgroup.com>; Cepko, Russ P <Russ.Cepko@cbs.com>; Diana Olson <diana.olson@hagerpacific.com>

**Subject:** Former Westinghouse Apparatus Repair Plant, Rancho Dominguez, California

Carmen,

To follow-up our call on October 1, 2015, we propose the following near-term schedule of deliverables and milestones relative to the PCB remediation of the former Westinghouse apparatus repair plant in Rancho Dominguez, California:

- CBS submittal of ProUCL calculations of exposure point concentrations in various media – October 30, 2015;
- EPA review and comment on EPC concentrations (1 week) – November 6, 2015;
- CBS submittal of draft annotated outline of proposed cleanup plan (4 weeks) – December 4, 2016;
- EPA review and comment on the draft annotated outline (2 weeks) – December 18, 2015
- CBS submittal of draft application and proposed cleanup plan (6 weeks) – January 29, 2015.

We trust this submittal satisfies your requirements at this time. Please contact me if you have any questions. Thanks.

Leo M. Brausch  
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Cell: (412) 720-8549  
Fax: (980) 339-3017